

Congress of the United States
House of Representatives
Washington, DC 20515-0530

HENRY A. WAXMAN
30TH DISTRICT, CALIFORNIA

December 29, 2005

The Honorable Deborah P. Majoras
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Dear Chairman Majoras:

The National Institutes of Health (NIH) recently completed a study which found that the dietary supplements glucosamine and chondroitin are no better than placebo at relieving arthritis joint pain.¹ A small sub-group of patients had more positive, but inconclusive results that experts have cautioned against reliance on.² Soon after the trial concluded, the Schiff Nutrition Group published an advertisement promoting the company's "Move Free Joint Strengtheners," a glucosamine and chondroitin dietary supplement.³ In a clear misrepresentation of the NIH study findings, the Move Free advertisement prominently declared:

Here's a slightly condensed version of the National Institutes of Health study on the effectiveness of Glucosamine and Chondroitin: It works.⁴

I am writing to request that the FTC consider taking enforcement action against the Schiff Nutrition Group for its Move Free advertisement which significantly distorted the scientific findings of the NIH study.

¹ The Washington Post, *Joint Dispute* (November 22, 2005) (online at: <http://www.washingtonpost.com/wp-dyn/content/article/2005/11/21/AR2005112101144.html?nav=hcmodule>)

² *Id.*

³ Schiff Nutrition Group, Advertisement for Move Free Joint Strengtheners—Triple Strength (Washington Post, November 22, 2005).

⁴ *Id.*

The NIH study's principal investigator, Daniel Clegg, M.D., described the study's findings as follows:

The first take-home message is that in the overall study population, none of the supplements were better than placebo....In an exploratory analysis of a subgroup with moderate to severe knee pain, the combination of glucosamine and chondroitin appeared to be effective.⁵

It was only when the researchers conducted the post-hoc subgroup analysis, to which Dr. Clegg refers above, that 20% of the participants with moderate to severe pain were shown to experience some degree of pain relief associated with taking the dietary supplement.⁶ However, experts have cautioned against reliance on this type of subgroup data analysis to answer questions not included in the study design.⁷

In spite of the overall negative study result and the inconclusive subgroup results, the Schiff Nutrition Group made the following statements about the study's conclusions:

The Glucosamine/Chondroitin Arthritis Intervention Trial Results Are In.

On November 14, 2005, the NIH released a study showing that Glucosamine/Chondroitin, the agents in all Move Free products, can be very effective in relieving joint discomfort and in maintaining healthy joints. If you're one of the 21 million Americans concerned with joint care, that's great news.

This scientific study involved five years of clinical trials and nearly 1,600 osteoarthritis patients and concluded that for some people, a combination of Glucosamine/Chondroitin is even more effective than what you may be using now. Just ask your doctor.⁸

Further, the advertisement omitted any mention of the overall negative findings of the study.

The Move Free advertisement constitutes an egregious misrepresentation of the NIH study results. Consumers who only saw this advertisement will inevitably be misled about the effectiveness of glucosamine and chondroitin at decreasing arthritis pain. I urge you to

⁵ The Washington Post, *Joint Dispute*, *Supra* note 1.

⁶ *Id.*

⁷ *Id.*

⁸ Schiff Nutrition Group, Advertisement for Move Free Joint Strengthener—Triple Strength, *Supra* note 3.

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consider taking enforcement action against the Schiff Nutrition Group for its dissemination of this deceptive information about an important public health issue.

Sincerely,

A handwritten signature in black ink that reads "Henry A. Waxman". The signature is written in a cursive, flowing style.

HENRY A. WAXMAN

Member of Congress